



G. Hamper
USEPA

217/782-6762

Date Received: June 27, 1991
Log #C-577-M-1

Refer to: 0316270004 -- Cook County

~~Decor~~ ~~Decorative Products~~

~~ILD113550932~~

RCRA-Closure

ILD 008 963 597

September 25, 1991

RECEIVED
MMD RCRA
RECORD CENTER

Decorel Incorporated
Attn: Mr. Eric J. Scheyer
444 E. Courtland
Mundelein, Illinois 60060

Dear Mr. Scheyer:

The closure plan submitted by Mr. Robert Kalicki of Decorative Products on June 25, 1991 (received June 27, 1991) has been reviewed by this Agency. Your final closure plan to close one hazardous waste container storage area (S01) and several hazardous waste treatment and/or storage tanks (S02 units) at the facility located at 2101 W. Carroll in Chicago, Illinois is hereby approved subject to the following conditions and modifications:

1. The following information must be received by November 15, 1991 for review and approval by this Agency. Failure to submit this information may result in enforcement action being taken by the Agency for not complying with the requirements of this approval letter. Additional modifications may be required following the review of the submittal.
 - a. A scaled topographic or county map showing the location of the facility must be provided. In addition, if another source is used, the scale of the map should be one inch equal to no more than 2000 feet.
 - b. A more detailed scaled map or diagram of the facility (including facility boundaries and all buildings present at the facility), with each hazardous waste management unit clearly located and identified must be provided. The scale of the facility map should be one inch equal to no more than 30 feet.
 - c. Details/specifications of any drainage troughs, floor drains, and subsurface pipes from the floor drains present in the area where hazardous wastes were stored and/or treated must be provided, including their direction of flow and their outlet. This should include scaled drawings and photographs to depict the location of these items.



- d. A description of the type of pavement surface within the building(s) at the facility must be provided, including a description of (1) the structural integrity of the surface(s) (i.e., cracks, joints, deterioration) and (2) any containment structures present in the areas where hazardous wastes were stored and/or treated (curbs). On page nine (Section six) of the June 25, 1991 submittal it is indicated there are no cracks on the floor. This statement must be certified by an Illinois registered professional engineer using the wording stated in 35 Illinois Administrative Code (IAC) 702.126. Also include in this certification the status of gaps, construction joints, or anything else which may disrupt the continuity of the floor within the on-site building. Color photographs should be provided to support the certification.
- e. Color photographs of the facility and each hazardous waste management unit at the facility must be provided to aid in the evaluation of the overall status of the facility. A sufficient number of photographs must be provided to adequately depict the current status of the facility, including photographs of all equipment present within the ground floor of the facility and all concrete floors. A map indicating the orientation of the photographer and the area being photographed must also be provided (a minimum of fifteen (15) photographs would appear to be necessary to properly depict the current status of this facility).
- f. A timetable must be provided which shows all critical dates for closure activities, including waste removal, sampling, soil removal, critical points when the independent engineer or his representative will be present, backfilling, survey plat preparation, independent engineer's certification, and other relevant activities. This timetable should generally start at the point of approval or some other definable date (i.e., award of contract, etc.), and not rely on calendar dates.
 1. 35 IAC 725.213 requires the owner/operator to treat, remove or dispose of all hazardous waste in accordance with the approved closure plan within 90 days after approval of the closure plan by the IEPA. The owner/operator must complete all closure activities in accordance with the approved closure plan and within 180 days after approval of the closure plan, if that is later.
 2. Closures requiring time periods longer than the above, including extensions after the closure plan approval, must be reviewed and approved by the IEPA (refer to 35 IAC 725.213).



- g. A scaled plan view (scale of one inch equal to no more than twenty (20) feet) of each hazardous waste management unit(s) must be provided, showing dimensions, appurtenant structures and relationship to other points or structures on the facility property, at a minimum. THE SCALE OF THE DRAWING MUST BE SPECIFIED. The map should indicate where wastes would flow if spilled, including the location of any drains, pipes leading from these drains, troughs, sumps or sewers that could potentially receive such spilled waste or contaminated runoff.
 - h. If containment structures are not present in the areas where hazardous waste was stored and/or treated (see Condition 1.d above), describe the drainage features of the plating area, wastewater treatment area, sludge drying area, hazardous waste container storage area and the overall building (inside and outside) and identify where spilled waste would flow. In addition, identify and describe the areas where loading and unloading of hazardous waste took place.
 - i. A plan must be provided for collecting/analyzing soil samples from near any floor drains and associated piping which may have received hazardous waste as a result of spills or other releases in the areas where hazardous waste was stored and/or treated. Guidance for the development of such a plan can be found in Section 13 of the enclosed instructions for the preparation of closure plans. This plan should also include a provision for collecting/analyzing soil samples at any defects in the integrity of the concrete floor during the inspection required by Condition 1.d above.
 2. Closure activities must be completed by April 1, 1992. When closure is complete the owner or operator must submit to the Agency certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. This certification must be received at this Agency within sixty (60) days after closure, or by June 1, 1992. These deadlines may be extended by the Agency based upon a review of the information required by Condition 1 above.

The attached closure certification form must be used. Signatures must meet the requirements of 35 Ill. Adm. Code Section 702.126. The independent engineer should be present at all critical, major points (activities) during the closure. These might include soil sampling, soil removal, backfilling, final cover placement, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity. Financial assurance must be maintained for the units approved for closure herein until the Agency approves the facility's closure certification.



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The Illinois Professional Engineering Act (Ill. Rev. Stat., Ch. 111, par. 5101 et. seq.) requires that any person who practices professional engineering in the State of Illinois or implies that he (she) is a professional engineer must be registered under the Illinois Professional Engineering Act (par. 5101, Sec. 1). Therefore, any certification or engineering services which are performed for a closure plan in the State of Illinois must be done by an Illinois P.E.

Plans and specifications, designs, drawings, reports, and other documents rendered as professional engineering services, and revisions of the above must be sealed and signed by a professional engineer in accordance with par. 5119, sec. 13.1 of the Illinois Professional Engineering Act.

As part of the closure certification, to document the closure activities at your facility, please submit a Closure Documentation Report which includes:

- a. The volume of waste and waste residue removed. The term waste includes wastes resulting from decontamination activities.
- b. A description of the method of waste handling and transport.
- c. The waste manifest numbers.
- d. Copies of the waste manifests.
- e. A description of the sampling and analytical methods used including sample preservation methods and chain-of-custody information.
- f. A chronological summary of closure activities and the cost involved.
- g. Color photo documentation of closure. Document conditions before, during and after closure.
- h. Tests performed, methods and results.
- i. A detailed discussion of the results of the inspections required by Conditions 4 and 9, including photographs.

The original and two (2) copies of all certifications, logs, or reports which are required to be submitted to the Agency by the facility should be mailed to the following address:

Illinois Environmental Protection Agency
Division of Land Pollution Control -- #24
Permit Section
2200 Churchill Road
Post Office Box 19276
Springfield, Illinois 62794-9276



3. Under the provisions of 29 CFR 1910 (51 FR 15,654, December 19, 1986), cleanup operations must meet the applicable requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health and safety programs, air monitoring, decontamination and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of 40 hours of safety and health training off site plus a minimum of three days of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight hours of specialized training on managing hazardous waste operations.
4. The concrete surface within the working area of the ground floor (including the former plating area, the sludge drum storage area, the areas where the rinsewater treatment tank and sludge evaporation tanks were located and all areas which could be affected by a release of hazardous waste from any of these areas) shall be visually inspected, photographed and any residue adhering to the surface must be removed by scraping and/or brushing without the use of water (i.e., while the surfaces are still dry). Following this, the concrete surfaces must be steam cleaned and triple rinsed. All wash and rinse water shall be collected. If analysis of the wash or rinse water samples detect the presence of F006 constituents (cadmium, chromium, copper, nickel, zinc or cyanide) above the constituent's PQL identified in SW-846 (Third Edition), then that material must be managed as a hazardous waste. If the wash or rinse water samples exhibit a characteristic of hazardous waste then that material must be managed as a hazardous waste. In any event the material must be managed as a special waste. After being decontaminated the concrete surfaces must be inspected by an independent registered professional engineer for cracks, joints or other defects that would allow waste to migrate through the concrete into the underlying soil. If any such defects are found, a closure plan modification request addressing soil sampling at those locations must be submitted to this Agency within sixty (60) days of such a finding.
5. All residue from decontaminating units which contained listed hazardous waste must be managed as a hazardous waste unless it is delisted under the provisions of 35 IAC 720.120 and 720.122 or is exempt under 721.103(a)(2)(D).
 - a. Tanks containing hazardous waste must be subjected to all reasonable means of decontamination before they can be considered "clean". This must include scraping/brushing off any residue followed by steam-cleaning and triple rinsing. All residue and wastewater generated must be collected and managed in accordance with the procedures set forth in Conditions 4 and 5.



- b. Disposal of hazardous waste and nonhazardous special waste within the State of Illinois requires a Waste Stream Permit issued by the Illinois EPA. Disposal of hazardous waste is also subject to Section 39(h) of the Environmental Protection Act which prohibits land disposal without a demonstration from the generator that the waste cannot be reasonably recycled for reuse, nor incinerated or chemically, physically or biologically treated to render the waste nonhazardous.

The application for the Waste Stream Permit is to be filed by the landfill or treatment facility operator. The application for a 39(h) authorization is to be filed by the generator of the waste. For more information on Section 39(h), contact the Permit Section at 217/782-6762.

6. Any equipment, including small tools, must be scraped and washed to remove waste residues. The residues must be managed as hazardous waste, and this cleaning and management must be described in this submittal.
7. Under the provisions of 29 CFR 1910 (51 FR 15,654, December 19, 1986), cleanup operations must meet the applicable requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health and safety programs, air monitoring, decontamination and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of 40 hours of safety and health training off site plus a minimum of three days of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight hours of specialized training on managing hazardous waste operations.
8. Prior to any on-site treatment of hazardous wastes as described in the closure plan, i.e., evaporation and processing through a wastewater treatment system, proper permits must be obtained from the Agency's Division of Water Pollution Control and Air Pollution Control. Additionally, permits may be required from the Metropolitan Water Reclamation District.
9. All drain troughs, floor drains and associated piping, etc. which may have collected and/or transferred releases of waste from the various hazardous waste management units at the facility must be decontaminated in accordance with the procedures contained in Condition 4 above. The integrity of the drain troughs must also be inspected in accordance with the procedures set forth in Condition 4 above.
10. If the Agency determines that implementation of this closure plan fails to satisfy the requirements of 35 Ill. Adm. Code, Section 725.211, the Agency reserves the right to amend the closure plan. Revisions of closure plans are subject to the appeal provisions of Section 40 of the Illinois Environmental Protection Act.



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11. If contamination is detected, the Agency must be notified in writing within fifteen (15) days. A revised closure plan addressing remediation of the contamination detected must be submitted within timeframes established by the Agency.
12. Please be advised that the requirements of the Responsible Property Transfer Act (Public Act 85-1228) may apply to your facility due to the management of RCRA hazardous waste. In addition, please be advised that if you store or treat on-site generated hazardous waste in containers or tanks pursuant to 35 IAC 722.134, those units are subject to the closure requirements identified in 35 IAC 722.134(a)(1).
13. All hazardous wastes that result from this project are subject to annual reporting as required in 35 IAC 722.141 and shall be reported to the Agency by March 1 of the following year for wastes treated and left on-site or shipped off-site for storage, treatment and/or disposal during any calendar year. Additional information and appropriate report forms may be obtained from the Agency by contacting:

Facility Reporting Unit
Division of Land Pollution Control
Illinois Environmental Protection Agency
P.O. Box 19276
Springfield, Illinois 62794-9276

Should you have any questions concerning this matter, please contact Michael A. Heaton at 217/782-6762.

Very truly yours,

Lawrence W. Eastep
Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:MH:bjh/sp/2887q/1,7

Enclosure and Attachment

cc: Haywood Region (w/o enc.)
Division File -- Closure (w/o enc.)
USEPA Region V -- George Hamper (w/o enc.) ✓
Michael A. Heaton (w/o enc.)
(Enforcement (w/o enc.)
RPNS (w/o enc.)



ATTACHMENT

This statement is to be completed by both the responsible officer and by the registered professional engineer upon completion of closure. Submit one copy of the certification with original signatures and three additional copies.

Closure Certification Statement

Closure Log C-577-M-1

The hazardous waste management container storage area (S01) and hazardous waste storage/treatment tanks (S02) units at the facility described in this document have been closed in accordance with the specifications in the approved closure plan. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

USEPA ID Number

Facility Name

Signature of Owner/Operator

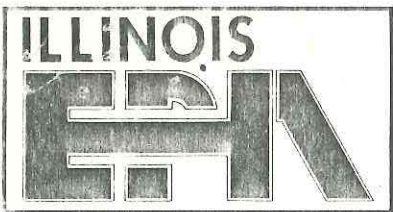
Name and Title

Signature of Registered P.E.

Name of Registered P.E. and Illinois
Registration Number

Date

LWE:MM:bjh/sp/2887q/9



Environmental Protection Agency

1701 S. First Street Maywood, IL. 60153

#968

312/345-9780

Refer to: General - Lake County - Mundelein/Condecor

December 6, 1982

Condecor
444 E. Courtland
Mundelein, Illinois 60060

Attn: Ken Sudman

Dear Mr. Sudman:

On November 30, 1982, representatives of the Illinois Environmental Protection Agency inspected your facility. The purpose of this inspection was to determine your facility's compliance with the Environmental Protection Act, Ill. Rev. Stat. 1982, Ch. 111 1/2, pars. 1001 et seq., as amended, and regulations adopted by the Illinois Pollution Control Board.

At the time of the inspection it appeared as though you are a small quantity generator. Therefore, if you comply with the requirements of 35 Ill. Adm. Code 721.105 you will not otherwise be subject to regulation under 35 Ill. Adm. Code 722 through 725, 40 CFR 122 through 124 and the notification requirements of Section 3010 of RCRA. Should you in the future no longer qualify for the small quantity exemption specified in 35 Ill. Adm. Code 725.105, please be advised that you will have to comply with 35 Ill. Adm. Code 720 through 725, 40 CFR 122 through 124, and the notification requirements of Section 3010 of RCRA.

Please confirm in a letter to us, within 15 days after receipt of this letter, whether you qualify for the small quantity exemption specified in 35 Ill. Adm. Code. 721.105. Please send such documentation to Mr. Kenneth P. Bechely at the above address, and carbon copy the USEPA Region V at 230 South Dearborn Street, Chicago, Illinois 60604.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kenneth P. Bechely".

Kenneth P. Bechely, Northern Region Manager
Field Operations Section
Division of Land Pollution Control

KPB:BPB:prb

Enclosure: Inspection Report

cc: Division File
Northern Region
USEPA - Region V

RECEIVED

DEC 08 1982

WASTE MANAGEMENT BRANCH
EPA, REGION V

TO: Mr. J. E. Edwards, Director, Illinois EPA DATE: 12-1-82FROM: David B. Brown, Regional Administrator, EPA Region 5 ☐ Information onlySUBJECT: Consolidated Waste Management Facility, Chicago, Illinois ☐ Response requested

Facility is subject to Consolidated Waste Management Act

(1) 7:1 195 = small quantity waste

2 chum / year

(2) 1:1 196 = 1 year 1 chum (1) 203

Flammable waste being

for recovery and incineration

Facility is currently using a double

membrane tank only - to store the waste

that is not immediately incinerated

with material in bag form that is

incinerated in other facilities

observed at the facility

General
STATE IDENTIFICATION NUMBER
(If Applicable)

IL0008963597
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
Form B Generator Inspection*
(40 CFR Part 262)

#960

I. General Information:*

- (A) Installation Name: Condecor
(B) Street: 444 East Courtland
(C) City: Mundelein (D) State: IL (E) Zip Code: 60060
(F) Phone: 312/566-4444 (G) County: LAKE
(H) Date of Inspection: 11-30-82 Time of Inspection (From) 9³⁰ AM (To) 11⁰⁰ AM
(I) Weather Conditions: 40°

(J) Person(s) interviewed	Title	Telephone
<u>Ken Sudman</u>	<u>Plant Superintendent</u>	<u>312/566-4444</u>
<u>Eileen Smith</u>	<u>Dept. Manager</u>	<u>"</u>

(K) Inspection Participants	Agency/Title	Telephone
<u>Brad Benning</u>	<u>IEPA/ EPS II</u>	<u>312/345-9780</u>

(L) Preparer Information

Name	Agency/Title	Telephone
<u>Brad Benning</u>	<u>"</u>	<u>"</u>

*Do not use this form if Generator is also a treatment, storage, and/or disposal facility.
Complete form "A" if the Generator is also a TSD facility.

II. BRIEFLY DESCRIBE SITE ACTIVITY

Facility manufactures picture frames for retail sale. They generate a lacquer thinner from coating the frames.

By reusing a portion of the waste lacquer thinner they have cut their waste generation to ~ 1 55 gal drum every 6 months. This material is

REMARKS: currently permitted to Hydrite Chem. in

Wisconsin. The facility hopes to change to a water base lacquer, which may stop any haz. waste generation.

Facility is exempt from regulation as a Small Quantity Generator 721.105, and that it is sending their waste (0001) to be reused, recycled 721.106.

INSPECTION AND ENFORCEMENT REVIEW/STATUS

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ID # ILD008963597FACILITY NAME CondecorLOCATION 444 East Courtland
Murdekin, ill 60060COMPLIANCE STATUS: IN OUT *non regulated*
VIOLATION CLASS: I II III
(G) T TSD *Small quantity generator*
REVIEWER: *2 Davis*
DATE: *1/11/83*INSPECTION REVIEW

ACTION ITEM	STRT DATE	END DATE	RPT COMP	STAT CODE	RESP AGCY	RESP PERS	COMM	FREE FLDS	TYPE INSP	PART AGCY	LINK
1	11/30/82	11/30/82	11/30/82	8	S	2D			N		

ENFORCEMENT ACTIONS

ACTION ITEM	DATE ISUD	DATE DUE	DATE RECD	STAT CODE	STAT DATE	RESP AGCY	RESP PERS	COMM	FREE FLDS	PLTY ASSD	PLTY CLTD	DTHR COM	DTHR COMP	LINK
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COMMENTS: